

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
MALIBU MEDIA, LLC,	:
	:
Plaintiff,	:
	:
vs.	:
	:
YI-TING CHEN,	:
	:
Defendant.	:
-----X	

Case No. 1:19-cv-07189-JGK

DECLARATION OF KEVIN T. CONWAY ESO., IN
SUPPORT OF MOTION FOR ENTRY OF FINAL DEFAULT
JUDGMENT AGAINST DEFENDANT YI-TING CHEN

Pursuant to 28 U.S.C. § 1746, I Kevin T. Conway, hereby declare:

1. I am an attorney with The Law Offices of Kevin T. Conway, attorneys for Plaintiff. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.
2. On July 31, 2019, Plaintiff filed the Complaint in this action. [CM/ECF 1].
3. Pursuant to the issuance of third-party subpoenas, Defendant's Internet Service Providers ("ISP") disclosed Defendant's true identity to Plaintiff.
4. On December 15, 2019, Plaintiff filed the Amended Complaint in this action [CM/ECF 14].
5. On July 27, 2020, a Clerk's Certificate of Default against Defendant Yi-Ting Chen was entered. [CM/ECF 39].
6. Defendant has failed to appear, plead or otherwise defend in this action.
7. Defendant is not a minor, incompetent, or in active duty military.

8. Plaintiff has incurred costs in this case in the amount of \$594.00, which includes the statutory filing fee of \$400.00, ISP fees of \$75.00 and process service fees of \$119.00.

FURTHER DECLARANT SAYETH NAUGHT.

DECLARATION

PURSUANT TO 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 30th day of July, 2020.

By:  _____